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Attorney for Defendant Shane Glenn Baker

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA,

No. 3:14-CR-00267-BR-04

Plaintiff,

v.

SHANE GLENN BAKER,

Defendant.

**DECLARATION OF BEAR
WILNER-NUGENT IN SUPPORT OF
DEFENDANT'S UNOPPOSED MOTION
TO CONTINUE TRIAL DATE**

I, BEAR WILNER-NUGENT, make the following declaration under the penalty of perjury and based on my own personal knowledge. I am competent to testify to the following:

1. I am the attorney for defendant Shane Glenn Baker. I make this declaration in support of Mr. Baker's unopposed motion to continue the trial date.
2. The trial is currently scheduled for 9:00 a.m. on September 2, 2014.
3. Mr. Baker seeks to continue the trial date until January 20, 2015.
4. Mr. Baker is currently in the custody of the United States Marshals Service and housed at the Sheridan Federal Detention Center.

5. This is Mr. Baker's first motion for a continuance in this case.
6. The indictment charges Mr. Baker with one count each of conspiracy to distribute heroin resulting in death, two counts of conspiracy to distribute heroin, and one count of distribution of heroin, crimes that expose Mr. Baker to a potential sentence of between 20 years and life in prison.
7. Mr. Baker has recently been indicted on serious controlled substance charges in the Clackamas County Circuit Court as well.
8. The requested continuance is necessary for the preparation of an effective defense because in a case with sentencing exposure of this gravity, a complete mitigation investigation covering Mr. Baker's entire life history will be necessary, as well as the factual investigation of the alleged offenses themselves, which is ongoing.
9. Counsel for the government does not oppose this motion.
10. All the codefendants' counsel who have responded to my email on the subject do not oppose this motion.
11. Mr. Baker consents to the period of excludable delay that will result from this motion.
12. I am not making this motion for the purpose of delay.

I hereby declare that the above statements are true to the best of my knowledge and belief and that I understand that they are made for use as evidence in court and are subject to penalty for perjury.

RESPECTFULLY SUBMITTED August 21, 2014.

/s/ Bear Wilner-Nugent
Bear Wilner-Nugent, OSB #044549
Attorney for Defendant Shane Glenn Baker